

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

vs.

**\$1,249,980.22 IN FUNDS  
IN BANK, OF AMERICA  
ACCOUNT NUMBER  
xxxx9287 HELD IN THE  
NAME OF KJ TRADE INC,**

Defendant Property.

and

**JUSTINA WILKERSON,**

Claimaint.

**CASE No.**

**1:22-cv-04311-VMC**

**VERIFIED CLAIM AND STATEMENT  
OF INTEREST OF KJ TRADE LTD INC.**

Claimant **KJ Trade Ltd INC.** through its Chief Executive Officer, **JUSTINA WILKERSON**, who makes and files this **VERIFIED**

**CLAIM AND STATEMENT OF INTEREST** asserting its interest in the \$1,249,980.22 dollars in United States currency, pursuant to Rule C(6), Supplemental Rules of Certain Admiralty and Maritime Claims, in response to the Complaint for Forfeiture filed by the United States of America and shows as follows:

1. **KJ TRADE LTD INC** claims an interest in the \$1,249,980.22 Dollars in United States currency seized by law enforcement and now in the custody, and under the control, of the United States Marshals Service.

2. **KJ Trade Ltd INC.** has an interest in the afore-referenced property which it earned through its retail business and hereby demands its restitution, and in accord therewith the right to defend Civil Action 1:22-cv-04311-VMC filed in this Court on October 28, 2022.

**DATE:** 13 December 2022.

By: /s Bruce S. Harvey  
Bruce S. Harvey  
Ga. Bar No. 335175

**LAW OFFICE OF BRUCE S. HARVEY**  
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By: /s E. Nicole Moorman

E. Nicole Moorman

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By: /s Stephen M. Katz

Stephen M. Katz

Ga. Bar No. 409065

**THE KATZ LAW FIRM – Ga. LLC**  
1225 Johnson-Ferry Road  
Building 100 – Suite 125  
Marietta, Georgia 30068-5407  
Telephone: 770.988.8181  
Email: smkatz@katz.legal

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served a copy of the

**VERIFIED CLAIM AND STATEMENT  
OF INTEREST OF KJ Trade Ltd INC.**

on opposing counsel by electronically filing a copy with the ECF system, commonly referred to as PACER, which will transmit a copy to:

Radka T. Nations, Esq.  
Assistant United States Attorney  
Northern District of Georgia  
600 Richard Russell Building  
75 Ted Turner Drive, SW  
Atlanta, Georgia 30303

**DATE:** 13 December 2022.


By: **/s Stephen M. Katz**  
Stephen M. Katz  
Ga. Bar No. 409065

**THE KATZ LAW FIRM – Ga. LLC**  
1225 Johnson-Ferry Road  
Building 100 – Suite 125  
Marietta, Georgia 30068-5407  
Telephone: 770.988.8181  
Email: smkatz@katz.legal

**VERIFICATION**

I, **JUSTINA WILKERSON**, Chief Executive Officer of **KJ Trade Ltd INC.** declare, certify, verify, and state under penalty of perjury and pursuant to 28 U.S.C. § 1746, that the foregoing **VERIFIED CLAIM AND STATEMENT OF INTEREST OF KJ Trade Ltd INC** is true and correct.

Executed on: 14 December 2022.

  
\_\_\_\_\_  
Justina Wilkerson, as CEO and on  
behalf of **KJ Trade Ltd INC**